

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications
and Energy on its own Motion to Implement the
Requirements of the Federal Communications
Commission's Triennial Review Order Regarding
Switching for Mass Market Customers

D.T.E. 03-60 – Track B

**AT&T's FIFTH SET OF INFORMATION REQUESTS TO
VERIZON-MASSACHUSETTS**

AT&T Communications of New England, Inc. ("AT&T") hereby submits to Verizon-Massachusetts ("Verizon") the following information requests. AT&T requests responses in accordance with the Procedural Order Memorandum and Ground Rules issued by the Department in this docket on October 17, 2003 and November 24, 2003.

INSTRUCTIONS

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
3. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
4. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
5. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
6. Unless otherwise stated, information requests refer to the state of Massachusetts.

INFORMATION REQUESTS

ATT-VZ-181 Please provide the denominator for total central office work time used in Verizon's Non-Recurring Cost Model. Please explain the following:

- (a) Is the denominator measured in number of hours or number of orders?
- (b) Does the denominator include maintenance activities?

ATT-VZ-182 Verizon's response to ATT-VZ-164 states: "Work code TRVL includes all travel time from point A to point B for travel between locations in the technician's tour. It is not specific to each job function performed at the location. It would be inappropriate to exclude travel time for maintenance and other non-UNE service order work tasks in the calculations since the travel time percentage is based on total travel as a percentage of total central office work. To exclude certain instances of travel time from the calculation (e.g., travel incurred to perform retail work) would require a similar exclusion of such instances of the underlying central office work (e.g., all of the central office wiring or other work associated with retail) from the total central office work. Such an exclusion to the calculations is not possible, nor would it likely lead to any significant difference in the result."

- (a) Please define the component "C.O. Work-time"
 - (i) Is this data recorded in Verizon's WFA/DI systems? If so, how?
 - (ii) What tasks or activities are included within this component?
 - (iii) Please provide a percentage breakdown of "C.O. Work time" as it relates to tasks, activities, trouble tickets, service orders, etc or any other event which was recorded in WFA/DI and contributed to the denominator in the calculation of "Travel as a Percentage of C.O. Work-time" in Verizon's Non-Recurring Cost Model appearing on the FACTORS worksheet.
- (b) Please provide the total number of employees that contributed data to the "C.O. Work-time component" and the "Travel as a Percentage of C.O. Work-time" component." Please explain the rationale if these two numbers are different.
- (c) Please verify that travel time and Central Office work time were calculated from data collected from central office technicians only. If this is not true, please indicate what additional employees contributed data to Verizon's calculation.
- (d) Is the travel time data referred to in (c) above culled from Verizon's WFA-DI system? Does the WFA-DI system keep track of travel time for all central office technicians who are required to travel between central offices? Does the WFA-DI system record travel time for other Verizon employees? If so, whom?
- (e) What Verizon employees are encompassed within the term central office "technician" as used within Verizon's answer to ATT-VZ 164? Please indicate what internal Verizon job titles are held by those employees included within this definition of "technician". For each job title, please indicate what percentage of C.O. work time for an employee in such a role consists of performing cross-wiring at a Central Office MDF. Please approximate such a percentage if necessary.
- (f) For each job title provided in response to (e) above, please provide total Central Office Work time and travel time that was used to compute "Travel as a

Percentage of C.O. Work-time" in Verizon's Non-Recurring Cost Model appearing on the FACTORS worksheet.

ATT-VZ-183 Please explain how Verizon's cost model accounts for travel time when the technician is traveling to complete only project or batch UNE orders.

ATT-VZ-184 Are costs for travel time associated with maintenance activities captured in nonrecurring or recurring rates? Please explain how such costs are captured through recurring or nonrecurring rates.

ATT-VZ-185 In Exhibit III-A to Verizon's Initial Panel Testimony regarding the Hot Cut Process and Scalability, Verizon lists the following as an Input Factor in its Non-Recurring Cost Model: Travel as a Percentage of C.O. Worktime = 8.9%. Please answer the following:

- (a) Does this mean that 8.9% of the CO Technician's recorded time is for travel?
- (b) What percentage of the CO technician's total work time is related to UNE hot-cut orders?

ATT-VZ-186 How many Verizon employees in Massachusetts perform hot cuts as part of their job responsibilities?

ATT-VZ-187 The following questions relate to Tables 3 & 4 found on pages 16 & 20 of William E. Taylor's Testimony and the accompanying explanation of the data contained therein:

- (a) Please describe in detail the migration process that Verizon follows when it wins a customer back from a facilities-based CLEC that provided service to the customer using its own loop and switch. This process description should include any service order, coordination, physical wiring, etc., work activities that must be performed by Verizon to achieve this migration.
- (b) Please describe in detail the migration process that Verizon follows when CLEC A wins a customer from a facilities-based CLEC B and CLEC A requests a UNE-L from Verizon in order to serve that customer. The process description should include any of the service order, coordination, wiring, etc., steps that Verizon must perform to provide an unbundled loop to CLEC A.
- (c) Please describe in detail the migration process that Verizon follows when it loses a retail customer to a facilities-based CLEC. This process description should include all of the service order, coordination, physical wiring, etc., steps that Verizon must perform to achieve this migration.
- (d) Please describe in detail the migration process that Verizon follows when a CLEC that provided service to its customer using resold Verizon service loses that customer to a facilities-based CLEC. This process description should include all of the service order, coordination, physical wiring, etc., steps that Verizon must perform to achieve this migration.
- (e) Please describe in detail the migration process that Verizon follows when a UNE-L CLEC loses a customer to a facilities-based CLEC. This process description should include all of the service order, coordination, physical wiring, etc., steps that Verizon must perform to achieve this migration.

ATT-VZ-188 How will status information be updated on Verizon's WPTS? Will status information be updated differently depending on what step has been accomplished in the provisioning process? If so, please indicate how status information will be updated at each point of the provisioning process at which an update is proposed.

AT&T Communications of New England, Inc.,
By its attorneys,

Kenneth W. Salinger
Ruth T. Dowling
Laurie S. Gill
John T. Bennett
Michael S. Rabieh
PALMER & DODGE LLP
111 Huntington Avenue
Boston, MA 02199
617.239.0100
617.227.4420 (fax)
Lgill@palmerdodge.com

Jay E. Gruber
Harry M. Davidow
AT&T Communications of
New England, Inc.
99 Bedford Street, 4th Floor
Boston, MA 02111
617.574.3149
jegruber@lga.att.com

January 21, 2004